

JASON M. FRIERSON  
United States Attorney  
District of Nevada  
Nevada Bar No. 7709

PATRICK A. ROSE  
Assistant United States Attorney  
Nevada Bar No. 5109  
501 Las Vegas Blvd. So., Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336  
patrick.rose@usdoj.gov  
*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Early McGee,

Plaintiff,

v.

United States of America;  
EURPAC Services, Inc., a Connecticut  
Corporation;  
Does I-X, and Roe Corporations I-X,  
inclusive,  
Defendants.

Case No. 2:20-cv-00334-RFB-BNW

**Proposed  
Joint Amended  
Discovery Plan and Scheduling Order**

Pursuant to the Court's Order (ECF No. 67) ("Order"), Plaintiff Early McGee, Defendant EURPAC Services, Inc., and Federal Defendant the United States, propose the new discovery schedule set forth below.

In the Order, the Court addresses issues that were raised during motion practice in May–June 2022, which had been the months for initial and rebuttal expert disclosures. The Order includes a directive for the parties to submit a new proposed schedule for an independent medical examination, expert disclosures (initial and rebuttal), dispositive motions, and a joint pretrial order.

Accordingly, the parties propose the following deadlines:

EVENT	DEADLINE
Independent Medical Examination	07/11/2023 <sup>1</sup>
Initial Expert Disclosures	08/10/2023
Rebuttal Expert Disclosures	09/08/2023
Discovery Cutoff	10/09/2023
Dispositive Motions	11/08/2023
Proposed Joint Pretrial Order	12/08/2023 <sup>2</sup>

Respectfully submitted this 14th day of April 2023.

INJURY LAWYERS OF NEVADA

/s/ Jared B. Anderson  
 Jared B. Anderson, Esq.  
 Nevada Bar No. 9747  
 4001 Meadows Lane  
 Las Vegas, NV 89122  
 Telephone (702) 868-8888  
 jared@injurylawyersnv.com  
*Attorneys for Plaintiff*

LEWIS BRISBOIS BISGAARD & SMITH

/s/ Christopher Elsee  
 Christopher Elsee, Esq.  
 Nevada Bar No. 13333  
 6385 S. Rainbow Blvd., Suite 600  
 Las Vegas, NV 89118  
 Telephone (702) 893-3383  
 christopher.elsee@lewisbrisbois.com  
*Attorneys for EURPAC Services*

JASON M. FRIERSON  
 United States Attorney

/s/ Patrick A. Rose  
 PATRICK A. ROSE  
 Assistant United States Attorney  
*Attorneys for the United States*

**IT IS SO ORDERED:**

  
**UNITED STATES MAGISTRATE JUDGE**

**DATED:** April 17, 2023

<sup>1</sup> The parties will work together to schedule the IME for a mutually convenient date and time.

<sup>2</sup> However, if dispositive motions were filed, then the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.